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International Specialists in the Environmental Sciences

MEMORANDUM

TO: Fred N. Rubel, Chief - Emergency Response and Hazardous Materials
Inspection Branch

FROM: Christine Hylemon, TAT II

SUBJECT: SPCC Desk Review, Lancia Oil Company, Hackensack, New Jersey -
TDD 2-8111-09.

DATE: December 4, 1981

As directed a desk review of the Lancia Oil Company's SPCC plan was conducted in accordance with 40 CFR 112.7. The following were noted:

1. The proposed increase in the capacity of the diked area is not sufficient to contain a spill from the single largest tank, as required by 40 CFR 112.7(2)(ii).
2. The plan does not discuss, in depth, the prediction of the direction of flow from the loading rack area. There is no secondary containment around the rack, as required by 40 CFR 112.7(b)(c).

The plan is also vague and contradicting on the above points. Therefore, an on-site inspection is recommended.

Attachment

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